

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

In re:

Case No. 8:13-bk-00922-KRM

CASEY MARIE ANTHONY,

Chapter 7

Debtor.

In re:

ROY KRONK,

Adversary No. 8:13-AP-00629-KRM

Plaintiff.

v.

CASEY MARIE ANTHONY,

Defendant.

**DEBTOR/DEFENDANT'S UNCONTESTED MOTION FOR EXTENSION OF TIME TO
CONDUCT THE DEPOSITION OF DOMINIC CASEY AND TO FILE MOTIONS FOR
SUMMARY JUDGMENT, RESPONSES THERETO AND TO RESCHEDULE PRE-TRIAL**

Debtor/Defendant, CASEY MARIE ANTIHONY, by and through her undersigned attorney, files this, her Uncontested Motion For Extension of Time To Conduct the Deposition of Dominic Casey and to File Motions For Summary Judgment, Responses Thereto, and To Reschedule Pre-trial and as grounds therefore states as follows:

1. On February 9, 2016, this Court entered its Order Setting Briefing Schedule and Continuing Hearing on Defendant's Motion For Judgment on the Pleadings, Response to Defendant's Motion For Judgment on the Pleadings and Plaintiff's Motion To Determine Whether Proceeding is Core ("Order") [Document No. 73].
2. Pursuant to said Order, the parties shall conduct the deposition of Dominic Casey by APRIL 1, 2016, and file any Motions For Summary Judgment by April 15, 2016, should they be so inclined.
3. Pursuant to said Order, Defendant scheduled the deposition of Dominic Casey for March 31, 2016 at the Law Office of Cheney Mason, 250 South Park Ave., #200, Winter Park, FL 32789.
4. For purposes of Dominic Casey's deposition, Defendant's counsel coordinated the scheduling with Plaintiff's counsel, who coordinated the date of the deposition with the deponent. However, Mr. Casey refused to appear at Mr. Mason's office for deposition, as he is a resident of Seminole County.

5. As a result, Mr. Casey did not attend the deposition scheduled for March 31, 2016 at the scheduled location. No subpoena had been issued compelling his attendance.
6. Debtor/Defendant believes Dominic Casey's deposition is necessary for her case, and therefore, the parties are available to reschedule the deposition at a location in Seminole County for May 9, 2016, pending this Court's ruling on this motion.
7. Debtor/Defendant intends to file a Motion For Summary Judgment herein. Defendant does not believe Plaintiff will do so but that may change based upon Mr. Casey's deposition testimony.
8. The information and testimony from the aforesaid deposition is necessary for the Debtor/Defendant to prepare her motion for summary judgment and responses thereto.
9. Debtor/Defendant hereby requests that the deadlines for the parties to file motions for summary for summary judgment be extended for 45 days, that responses thereto be filed within 14 days following and that the court schedule a time after that for pretrial and to allow argument on all pending motions.
10. Counsel for Plaintiff has advised the undersigned that he has no objection to the relief requested in this Motion.

WHEREFORE, Debtor/Defendant respectfully requests entry of an order allowing the parties to complete the deposition of Dominic Casey by May 15, 2016, file motions for summary judgment by June 1, 2016, and responses thereto by June 15, 2016; that the pretrial conference previously scheduled for May 13, 2016 be canceled and rescheduled to a date on or after July 1, 2016; and for such other and further relief as the Court deems just and proper.

/s/ David L. Schrader

David L. Schrader

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CERTIFICATE OF SERVICE

I HEREBY certify that a true and correct copy of the foregoing document has been emailed to Howard Marks, Esq., Burr & Forman, LLP., hmarks@burr.com rshuker@lseblaw.com; and Cheney Mason, Esq. cheneylaw@aol.com; and ChenMas4@aol.com this 14th day of April, 2016.

/S/ David L. Schrader

David L. Schrader, Esquire